

EXHIBIT “A”

Anderson Kill P.C.

1251 Avenue of the Americas, New York, NY 10020
(212) 278-1000 EIN:13-2743351
E-Mail: Accounting@andersonkill.com

David J. Molton, Esq.
Brown Rudnick LLP
Seven Times Square
New York, NY 10036

Invoice No. 318005
Invoice Date: August 4, 2023
Client Matter ID: 107310.12093
Billing Attorney: Robert M Horkovich

Official Talc Claimants Committee

LTL II Insurance Coverage

Professional Services:	\$155,101.00
Costs:	\$176.00
Total Current Invoice:	\$155,277.00
Outstanding Balance from Prior Invoices (see listing):	\$74,129.50
Total Amount:	\$229,406.50

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August 4, 2023

Invoice No. 318005

MATTER: LTL II Insurance Coverage

INVOICE LIST

INVOICE	DATE	INVOICE TOTAL
317896	07/31/23	\$74,129.50
OUTSTANDING BALANCE FROM PRIOR INVOICES		\$74,129.50

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Billing Attorney Robert M Horkovich
Invoice No. 318005
Invoice Date August 4, 2023

Client Matter #: 107310.12093
Official Talc Claimants Committee
RE: LTL II Insurance Coverage

FOR PROFESSIONAL SERVICES RENDERED THROUGH July 31, 2023

Date	Professional	Hours	Task	Narrative	Amount
07/03/23	RMH	0.50	B160	Review of retention application.	622.50
07/05/23	RMH	1.50	B160	Revisions to retention application.	1,867.50
07/10/23	MG	4.30	B120	Analyze impact of proposed plan on insurance assets.	4,085.00
07/10/23	RMH	1.60	B120	Analysis of insurance-related implications of new plan language.	1,992.00
07/10/23	MDS	0.40	B120	Review of insurance-related provisions of revised plan of reorganization.	380.00
07/11/23	RMH	1.00	B120	Analysis of insurance implications of new plan.	1,245.00
07/11/23	MDS	1.40	B120	Initial review of revised draft plan of reorganization regarding treatment of insurance policies and coverage litigation rights.	1,330.00
07/11/23	MDS	0.30	B120	Review of analysis of revised draft plan of reorganization.	285.00
07/11/23	MDS	0.40	B120	Discussion regarding review choice of forum clauses in insurance policies.	380.00
07/11/23	MG	3.70	B120	Analyze impact of proposed plan on insurance assets.	3,515.00

Date	Professional	Hours	Task	Narrative	Amount
07/11/23	MG	1.80	B120	Draft email memo re impact of proposed plan on insurance assets.	1,710.00
07/12/23	MG	2.90	B120	Draft email memo re impact of proposed plan on insurance assets.	2,755.00
07/12/23	RMH	2.00	B120	Analysis of insurance impact in new plan.	2,490.00
07/12/23	MDS	2.40	B120	Comprehensive analysis of revised draft plan of reorganization with regard to insurance-related issues and role of committee post-confirmation.	2,280.00
07/13/23	MDS	0.40	B120	Communication regarding key issues relating to insurance treatment and committee's interest therein post-confirmation.	380.00
07/13/23	MDS	0.40	B120	Follow up regarding analysis of insurance-related issues to draft plan of reorganization.	380.00
07/13/23	MG	2.60	B120	Analyze insurance assets in connection with proposed plan.	2,470.00
07/13/23	RMH	1.00	B120	Analysis of insurance implications of new plan.	1,245.00
07/14/23	RMH	1.00	B120	Review of insurance implications of new plan.	1,245.00
07/14/23	MDS	0.40	B120	Review of case status and issues related to insurance neutrality provision of draft plan of reorganization.	380.00
07/17/23	RMH	1.20	B120	Analysis of insurance implications of findings of fact and conclusions of law.	1,494.00
07/18/23	MG	1.80	B120	Analyze plan and disclosure statement re insurance-related issues.	1,710.00
07/18/23	RMH	2.00	B120	Analysis of insurance implications of proposed findings of fact and conclusions of law.	2,490.00
07/19/23	RMH	1.50	B120	Attend committee counsel call.	1,867.50
07/19/23	RMH	4.00	B120	Analysis of insurance implications of proposed findings of fact and conclusions of law.	4,980.00

Date	Professional	Hours	Task	Narrative	Amount
07/19/23	MG	2.20	B120	Analyze plan and disclosure statement re insurance-related issues.	2,090.00
07/19/23	AHP	0.30	B160	Respond to emails re status.	105.00
07/19/23	AHP	2.90	B160	Review of LTL II retention application for ethical wall.	1,015.00
07/19/23	MDS	1.40	B120	Initial analysis of draft disclosure statement filed last week.	1,330.00
07/19/23	MDS	0.30	B120	Email communication regarding timing on hearing on draft disclosure statement and objection deadline.	285.00
07/19/23	MDS	0.70	B120	Review of prior internal analysis of plan issues regarding insurance policy treatment.	665.00
07/19/23	MDS	0.20	B120	Email exchange regarding insurance issues in plan and key factors implicating significance of insurance treatment.	190.00
07/20/23	IF	2.10	B120	Analyzed J&J insurance policies re: choice of law language.	966.00
07/20/23	MDS	0.30	B120	Meeting with regard to scope of insurance component of objection to debtor's disclosure statement.	285.00
07/20/23	MDS	0.40	B120	Meeting with regard to choice of forum clauses in insurance policies and valuation of policies subject to reorganization trust.	380.00
07/20/23	MDS	1.40	B120	Further review of current iterations of debtor's plan and disclosure statement in advance of drafting discussion points regarding insurance aspects of disclosure statement objection.	1,330.00
07/20/23	HEG	3.20	B120	Research re insurance policy language.	1,280.00
07/20/23	RMH	3.80	B120	Analysis of insurance implications of proposed findings of fact and conclusions of law.	4,731.00
07/20/23	MG	1.80	B120	Analyze plan and disclosure statement re insurance-related issues.	1,710.00
07/21/23	IF	1.60	B120	Continued to analyze J&J insurance policies regarding choice of law provisions.	736.00

Date	Professional	Hours	Task	Narrative	Amount
07/21/23	RMH	3.80	B120	Analysis of insurance implications of new plan.	4,731.00
07/21/23	MG	2.70	B120	Analyze plan and disclosure statement re insurance-related issues.	2,565.00
07/21/23	MDS	0.20	B120	Email exchange with regard to certain insurance-related issues.	190.00
07/21/23	AHP	1.20	B160	Begin drafting documents for 1st fee application.	420.00
07/21/23	MDS	2.40	B120	Draft memorandum regarding insurance treatment in plan of reorganization and disclosure statement.	2,280.00
07/24/23	MDS	3.20	B120	Draft comprehensive memorandum regarding insurance-related issues for committee's disclosure statement objection.	3,040.00
07/24/23	MDS	0.20	B120	Brief conference regarding potential edits to draft objections.	190.00
07/24/23	RMH	4.20	B120	Analyze insurance aspects of debtor's disclosure statement.	5,229.00
07/24/23	IF	2.10	B120	Analyzed J&J insurance policies re: choice of law language.	966.00
07/24/23	HEG	0.80	B120	Research re insurance policy language.	320.00
07/24/23	MG	1.40	B120	Analyze possible plan/disclosure objections re insurance-related issues.	1,330.00
07/25/23	MDS	2.20	B120	Further revisions to memorandum regarding insurance issues raised by current version of debtor's plan and disclosure statement.	2,090.00
07/25/23	MDS	0.70	B120	Meeting to review comprehensive memorandum regarding insurance terms of debtor's current plan and disclosure statement.	665.00
07/25/23	RMH	2.60	B120	Analyze insurance aspects of debtor's disclosure statement.	3,237.00
07/25/23	IF	1.90	B120	Analyzed J&J insurance policies regarding choice of law provisions.	874.00

Date	Professional	Hours	Task	Narrative	Amount
07/25/23	HEG	4.40	B120	Research re insurance policy language.	1,760.00
07/25/23	MG	1.70	B120	Analyze possible plan/disclosure objections re insurance-related issues.	1,615.00
07/26/23	MDS	0.40	B120	Review memorandum and case law references thereto.	380.00
07/26/23	RMH	0.50	B120	Attend Committee Professional meeting.	622.50
07/26/23	RMH	0.60	B120	Attend Committee member meeting.	747.00
07/26/23	RMH	2.10	B120	Review of debtor's disclosure statement.	2,614.50
07/26/23	IF	1.90	B120	Analyzed J&J insurance policies regarding choice of forum provisions.	874.00
07/26/23	HEG	4.30	B120	Analysis of research re insurance policy language.	1,720.00
07/26/23	MG	2.70	B120	Revise memo re possible plan/disclosure objections re insurance-related issues.	2,565.00
07/27/23	MDS	0.80	B120	Finalize memorandum summarizing insurance-related issues of current iterations of debtor's plan and disclosures statement.	760.00
07/27/23	MDS	0.30	B120	Communication with regard to Judge Kaplan's noticing of hearing on Friday and status of motion to dismiss petition.	285.00
07/27/23	RMH	2.80	B120	Review of impact on insurance aspects of disclosure statement.	3,486.00
07/27/23	HEG	3.80	B120	Research re insurance policy language.	1,520.00
07/27/23	IF	1.70	B120	Analyzed J&J insurance policies regarding choice of forum provisions.	782.00
07/27/23	MG	2.60	B120	Analyze insurance re possible plan/disclosure objections.	2,470.00
07/28/23	MDS	0.40	B120	Email regarding dismissal opinion from Judge Kaplan, news reports and debtor's public announcement re same.	380.00

Date	Professional	Hours	Task	Narrative	Amount
07/28/23	MDS	0.30	B120	Review of multiple press accounts of decision dismissing Chapter 11 case.	285.00
07/28/23	RMH	3.00	B120	Analyze bankruptcy court opinion.	3,735.00
07/28/23	RMH	0.30	B120	Attend Committee conference call.	373.50
07/28/23	RMH	2.00	B120	Follow up regarding insurance-related issues.	2,490.00
07/28/23	IF	1.60	B120	Analyzed J&J insurance policies regarding choice of forum provisions.	736.00
07/28/23	MG	1.60	B120	Analyze insurance re case dismissal.	1,520.00
07/29/23	MDS	0.40	B120	Review of Judge Kaplan's memorandum decision dismissing Chapter 11 case.	380.00
07/29/23	RMH	0.50	B120	Conference call with committee professionals.	622.50
07/29/23	RMH	3.70	B120	Work on final insurance presentation to committee counsel.	4,606.50
07/29/23	MG	2.40	B120	Review insurance presentation re insurance-related issues.	2,280.00
07/30/23	MDS	0.40	B120	Additional review of ongoing press accounts and status of stay issue.	380.00
07/30/23	RMH	2.30	B120	Work on final insurance presentation to committee counsel.	2,863.50
07/30/23	MG	1.20	B120	Review insurance presentation re ongoing insurance-related issues.	1,140.00
07/31/23	IF	2.10	B120	Assisted in updating J&J insurance policy language information.	966.00
07/31/23	IF	1.10	B120	Analyzed J&J insurance policies regarding choice of forum provisions.	506.00
07/31/23	MDS	0.30	B120	Review of today's articles regarding Friday's decision on dismissal of LTL Chapter 11 case.	285.00

Date	Professional	Hours	Task	Narrative	Amount
07/31/23	MDS	0.20	B120	Review LTL docket with regard to likely motion to stay order dismissal of case.	190.00
07/31/23	MDS	0.30	B120	Communications with regard to Wednesday's upcoming hearing and insurance-related issues in connection with anticipated motion to stay order dismissing chapter 11 case.	285.00
07/31/23	MDS	0.10	B120	Review client email regarding effective date of dismissal and absence of formal order to date.	95.00
07/31/23	AHP	0.10	B160	Review docket.	35.00
07/31/23	AHP	0.20	B160	Resolve issues relating to timekeeper summaries.	70.00
07/31/23	AHP	0.90	B160	Review invoice for confidentiality.	315.00
07/31/23	AHP	1.60	B160	Finishing drafting documents for 1st monthly fee application.	560.00
07/31/23	AHP	0.30	B160	Prepare documents for review and filing.	105.00
07/31/23	HEG	2.70	B120	Assisted in preparation for presentation to committee.	1,080.00
07/31/23	RMH	1.00	B120	Attend Committee counsel call.	1,245.00
07/31/23	RMH	3.30	B120	Review insurance presentation to committee counsel.	4,108.50
07/31/23	MG	6.30	B120	Review insurance presentation re ongoing insurance-related issues.	5,985.00
07/31/23	RMH	2.40	B120	Revise insurance presentation to committee counsel.	2,988.00
07/31/23	RMH	2.80	B120	Draft insurance presentation to committee counsel.	3,486.00
Total Fees:					\$155,101.00

SUMMARY OF PROFESSIONAL SERVICES

PROFESSIONAL	HOURS	RATE	AMOUNT
Robert M Horkovich	59.00	1,245.00	73,455.00
Mark Garbowski	43.70	950.00	41,515.00
Mark D Silverschotz	23.60	950.00	22,420.00
Izak Feldgreber	16.10	460.00	7,406.00
Harris E Gershman	19.20	400.00	7,680.00
Arline H Pelton	7.50	350.00	2,625.00
	169.10		\$155,101.00

SUMMARY OF SERVICES BY ACTIVITY

	HOURS	RATE	AMOUNT
ACTIVITY CODE B120 ASSET ANALYSIS & RECOVERY			
Horkovich, Robert M	57.00	1,245.00	\$70,965.00
Garbowski, Mark	43.70	950.00	\$41,515.00
Silverschotz, Mark D	23.60	950.00	\$22,420.00
Feldgreber, Izak	16.10	460.00	\$7,406.00
Gershman, Harris E	19.20	400.00	\$7,680.00
	159.60		\$149,986.00
ACTIVITY CODE B160 FEE/EMPLOYMENT APPLICATIONS			
Horkovich, Robert M	2.00	1,245.00	\$2,490.00
Pelton, Arline H	7.50	350.00	\$2,625.00
	9.50		\$5,115.00

DISBURSEMENTS

07/17/2023	RMH	Vendor: ROBERT M HORKOVICH; Invoice#: 07/17/2023; Date: 7/17/2023 - 107206.11973 7/13 AMTRAK TRAIN TICKETS FOR BOB HORKOVICH, KRISTEN HAND, SAL SALERNO, TO ATTEND HEARING FOR LTL	176.00
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Sub-Total Disbursements: \$176.00

TOTAL CURRENT BILLING: \$155,277.00

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MATTER: 107310. 12093
INVOICE: 318005

August 4, 2023

Official Talc Claimants Committee

MATTER: LTL II Insurance Coverage

REMITTANCE COPY

Professional Services	\$155,101.00
Costs:	\$176.00
Total Current Invoice:	\$155,277.00
Outstanding Amount From Prior Invoices:	\$74,129.50
TOTAL AMOUNT DUE:	\$229,406.50

PLEASE SEND YOUR REMITTANCE TO US AT:

Anderson Kill P.C.
1251 Avenue of the Americas
New York, NY 10020

OR, IF MORE CONVENIENT, YOU MAY WIRE THE FUNDS TO

BANK: WELLS FARGO BANK, N.A.
ABA NUMBER FOR WIRES: [REDACTED]
ABA NUMBER FOR ACHs: [REDACTED]
CREDIT TO: ANDERSON KILL P.C.
OPERATING ACCOUNT
ACCOUNT NUMBER: [REDACTED]

KINDLY INDICATE:

CLIENT NUMBER: 107310
INVOICE NUMBER: 318005
YOUR FIRM NAME: Official Talc Claimants Committee

THIS INVOICE IS PAYABLE UPON RECEIPT

PLEASE RETURN THIS PAGE WITH YOUR REMITTANCE